

## REMARKS/ARGUMENTS

Claims 1, 8 and 15 have been amended. No claims have been canceled. Claims 1-21 represent the set of claims currently pending in this application. Reexamination and reconsideration of the application as amended are respectfully requested.

### **The Present Application**

For purposes of review, the present application is directed to transforming individual web elements (e.g. web pages or help files) into a linked structure, such as a website. A web developer directs a link management system to create the various links by providing a list of identifiers arranged in an hierarchical order. Each identifier corresponds to an individual web element, referred to as "unit of information". The developer, by determining the hierarchical ordering of the identifiers, controls the creation of the website in accordance with the developer's linking plan.

The present invention provides a very efficient way to link together the elements of a newly created website, as well as revamp an existing website in which new elements are added, old elements are deleted, and/or relationships between elements change. The hierarchical list of IDs facilitates an easy and efficient way to direct the link management system without the developer having to learn a new programming language, or manually edit each and every link within the website.

### **The Selvin Reference**

Selvin teaches a convenient method for creating a hypertext database from one or more source documents wherein the nodes and links within the hypertext database mirror

the logical structure of the one or more source documents. (See column 5, lines 18-21; column 5, lines 29-31; column 6, lines 10-13; column 8, lines 31-37; column 8, lines 40-42; and column 11, lines 60-63.) Selvin does not teach providing a developer determined hierarchical list of identifiers for the purpose of linking various source documents elements in accordance with the linking plan the developer. Rather, Selvin teaches a convenient method for creating a linked structure that mirrors the existing logical structure of one or more source documents by analyzing the source documents themselves.

**Rejection under 35 USC § 102(e)**

The Examiner rejected claims 1-3, 7/3, 8-10, 14/10, 15-17, and 21/17 as being anticipated by US Patent number 6,718,329 B1 issued to Selvin et al. (hereinafter "Selvin"). Applicant respectfully traverses these rejections for at least the reasons set forth below.

**Claims 1, 8 and 15**

Applicant's agent thanks the Examiner for the careful review of applicant's appeal brief and the subsequent removal of the previously cited references referred to in applicant's brief as the "Blumer" reference and the "Astiz" reference. Applicant's agent also thanks the Examiner for her additional effort to search for additional art to ensure the highest level of quality associated with the examination process.

Applicant has amended claims 1, 8 and 15 in order to further refine the claim language such that the novel features of applicant's invention are clearly distinguishable

over the Selvin reference. As discussed supra, Selvin is mirroring the logical structure of one or more source documents, whereas applicant's present invention is establishing and/or changing a logical structure for a plurality of source documents. The newly created or changed logical structure is driven by the user determined hierarchical list of identifiers and is independent of any inherent logical structure existing within the source documents. By changing the term "predetermined" to "user determined" in claims 1, 8 and 15, this fundamental distinction between Selvin and the present invention is more clearly articulated.

Applicant's agent, prior to the present amendment, relied upon the specification to define "list of identifiers". However, applicant's agent concedes that "list of identifiers" has recognizable meaning within the art and therefore the limitations within the specification intended to be relied upon may be exceeded in the Examiner's interpretation of the claim language. Therefore, applicant's agent has amended the language for claims 1, 8 and 15 to articulate that the list of identifiers has a "user determined" relative hierarchical order to clearly distinguish over the inherent hierarchical order associated with any given set of source documents, as taught by Selvin. Additionally, claims 8 and 15 were amended to correct a minor typographical error.

Claims 1, 8, and 15, as presently amended, distinguish over Selvin. Applicant's disclosure reveals a novel and unobvious invention for creating a web of linked units of information wherein a user determined hierarchical list of identifiers is provided to direct a link management system in the creation of a website wherein the linking conforms to the intentions of a user independent of the format of any source documents. In view of the above amendment of the independent claims, it is now apparent that Selvin does not

teach or suggest Applicant's claimed invention, since Selvin relies upon the inherent structure of the one or more source documents to generate a hypertext database. Since Selvin fails to anticipate claims 1, 8 or 15, Applicant submits that these claims are in immediate condition for allowance and respectfully request the Examiner to withdraw the 35 U.S.C 102(e) rejection.

**Claims 2-3, 7/3, 9-10, 16-17, and 21/17**

Claims 2-3, 7/3, 9-10, 16-17, and 21/17 depend directly or indirectly from the amended independent claims. Accordingly, Applicant respectfully submits that these dependent claims assume the patentable subject matter from their respective amended independent claims from which they depend, and are therefore also in immediate condition for allowance.

In consideration of the foregoing, Applicant respectfully requests that the Examiner reconsider and withdraw the 35 U.S.C. 102(e) rejection for claims 2-3, 7/3, 9-10, 16-17, and 21/17.

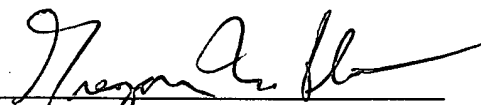
**Allowable Subject Matter**

Claims 4-6, 7/5, 11-13, 14/12, 18-20, and 21/15 are objected to by the Examiner as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Since the rejected base claims have been amended to overcome the Examiner's rejections, these objected to claims are asserted to now be in condition for allowance, and such allowance is hereby respectfully solicited.

### Conclusion

Applicant therefore respectfully requests that the Examiner reconsider all currently outstanding objections and rejections and that they be withdrawn. It is believed that a full and complete response has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. A prompt and favorable consideration of this Response is respectfully solicited. If the Examiner believes, for any reason, that personal communication will expedite prosecution of the application, the Examiner is invited to telephone the undersigned at the number provided.

Respectfully submitted,

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Date: August 12, 2004